

Lawrence A. Katz (VSB No. 47664)  
HIRSCHLER FLEISCHER, P.C.  
8270 Greensboro Drive  
Suite 700  
Tysons, Virginia 22102  
Telephone: 703-584-8362  
Facsimile: 703-584-8901  
Email: lkatz@hirschlerlaw.com

*Counsel for Washington Prime Group Inc.*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(RICHMOND DIVISION)**

**In re:**

**CHINO HOLDINGS, INC., et al.,**  
**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 20-32181**

**(Joint Administration Requested)**

**MOTION PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)  
FOR ADMISSION PRO HAC VICE**

Lawrence A. Katz (“Movant”), a member in good standing of the Virginia State Bar, a lawyer admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and a partner in the firm of Hirschler Fleischer, hereby moves the Court to enter an order permitting Ronald Eric Gold, a lawyer with the firm of Frost Brown Todd LLC, 3300 Great American Tower, 301 East 4<sup>th</sup> Street, Cincinnati, Ohio 45202, to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia, to represent Washington Prime Group Inc., pursuant to Local Bankruptcy Rule 2090-1(E)(2) (the “Motion”).

---

<sup>1</sup> The Debtors in these chapter 11 cases are Chinos Holdings, Inc.; Chinos Intermediate Holdings A, Inc.; Chinos Intermediate, Inc.; Chinos Intermediate Holdings B, Inc.; J. Crew Group, Inc.; J. Crew Operating Corp.; Grace Holmes, Inc.; H.F.D. No. 55, Inc.; J. Crew Inc.; J. Crew International, Inc.; J. Crew Virginia, Inc.; Madewell Inc.; J. Crew Brand Holdings, LLC; J. Crew Brand Intermediate, LLC; J. Crew Brand, LLC; J. Crew Brand Corp.; J. Crew Domestic Brand, LLC; and J. Crew International Brand, LLC.

In support of the Motion, Movant states as follows:

- 1) Ronald Eric Gold is a member in good standing of the Bar of the State of Ohio, the United States District Courts for the Northern and Southern Districts of Ohio, the United States District Court for the Northern District of Illinois, the United States District Courts for the Northern and Southern Districts of Indiana, the United States District Court for the District of Colorado, the United States District Court for the Eastern District of Wisconsin, the United States Court of Appeals for the Sixth Circuit, and the United States Court of Appeals for the Seventh Circuit. There are no disciplinary proceedings pending against Mr. Gold.
- 2) Mr. Gold understands that if he is admitted *pro hac vice* to practice before this Court, he will be subject to the disciplinary jurisdiction of this Court.
- 3) A copy of Mr. Gold's written application required by Local Bankruptcy Rule 2090-1(E)(2) is appended to and incorporated herein by reference in this Motion.
- 4) Notice of this Motion has been given to the Office of the United States Trustee for the Eastern District of Virginia and counsel for the Debtor. Because of the administrative nature of the relief requested herein, Movant submits that no other or further notice need be given.
- 5) Pursuant to Local Rule 9013-1(G) and because there are no novel issues of law to be presented in the Motion, Movant requests that this Court waive the requirement of an accompanying written memorandum of points and authorities.

WHEREFORE, Movant respectfully requests that the Court enter an order substantially in the form annexed hereto, (i) permitting Mr. Gold to appear *pro hac vice* in association with Movant as counsel for Washington Prime Group, Inc. in this bankruptcy case and in any related adversary proceedings, and (ii) granting any other relief as is just.

Date: May 4, 2020

Respectfully submitted,

**MOVANT**

By: /s/ Lawrence A. Katz  
Lawrence A. Katz (VSB No. 47664)  
HIRSCHLER FLEISCHER, P.C.  
8270 Greensboro Drive  
Suite 700  
Tysos, Virginia 22102  
Telephone: 703-584-8362  
Facsimile: 703-584-8901  
Email: lkatz@hirschlerlaw.com

*Counsel for Washington Prime Group Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of May, 2020, I caused a copy of the foregoing pleading to be sent via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

*/s/ Lawrence A. Katz*

Lawrence A. Katz

12298543.1 045305.00001